

### **REMARKS**

The above amendments to the above-captioned application along with the following remarks are being submitted as a full and complete response to the Office Action dated October 5, 2005 (U.S. Patent Office Paper No. 20050913). In view of the above amendments and the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

#### **Status of the Claims**

As outlined above, claims 1-21 are being canceled without prejudice or disclaimer, while new claims 22-35 are hereby submitted for consideration. Applicant hereby submits that no new matter is being introduced into the application through the submission of this response.

#### **Formal Objections or Rejections**

Claims 2, 6, 11, 18 and 19 were rejected under 35 U.S.C. §112, first paragraph, for failing to comply with the enablement requirement. The Examiner took the position that the recitation of the claims was not enabled in the specification. Further, claims 1-17, 20 and 21 were rejected under 35 U.S.C. §112, second paragraph, for being indefinite. In particular, language in the claims was cited as being indefinite or unclear.

As outlined above, claims 1-21 are being canceled, thereby rendering these rejections moot. However, to the extent applicable, Applicant contends that the disclosure of the present invention does in fact provide sufficient and clear support for the present invention as now claimed that would be understood by those of skill in the art. In particular, as illustrated in Figures 2 and 3, legacy devices such as sensors and mail processing machines generate output signals or receive input signals, respectively, from legacy controllers via legacy I/O cards. The master controller or modern controller communicates with and controls the legacy controllers by providing each legacy controller with its executable software and/or instructions from master/modern controller. The integrated signal conditioning circuit card assembly is installed between the legacy controllers and distributed I/O modules, and is controlled by the master/modern controller. (See, for example, paragraphs [0011], [0018], [0021], and [0022]-[0025].)

In order for the master/modern controller to control the transfer of signals between the legacy devices and the legacy controllers, and thereby control the operation of the legacy components, the integrated signal conditioning circuit is connected between those devices

and is itself controlled by the master controller. Specifically, as illustrated in Figure 3 and discussed in paragraph [0024], the “conditioning” being performed by the integrated signal conditioning circuit involves giving the master/modern controller access to those signals whereby the master/modern controller either allows signals to pass uninterrupted to the intended recipient or to limit or even replace those signals. For example, discrete output signals 72,73 from sensors may either be allowed to pass through to the legacy controller 24 (i.e., monitor) or interrupted based on instructions from the master/modern controller (i.e., interrupt). Also, signals 82,83 from the legacy controller 24 to output devices may also be allowed to pass-through or be overridden by the master/modern controller.

As such, Applicant will submit that one of skill in the art would find such disclosure in the present application to be sufficient support for the invention as now claimed.

#### Prior Art Rejections

Claim 20 was rejected under 35 USC §102(b) as being anticipated by Fogg (U.S. Patent No. 5, 766,027). Claims 1-3 were rejected under 35 USC §102(b) as being anticipated by Kreuter (U.S. Patent No. 6,392,557). Claims 5-8, 10, 11, and 18 were rejected under 35 USC §102(e) as being anticipated by Kinstler (U.S. Patent No. 6,831,926).

Claim 4 was rejected under 35 USC §103 as being obvious over Kreuter (U.S. Patent No. 6,392,557). Claims 12-16 were rejected under 35 USC §103 as being obvious over Kinstler (U.S. Patent No. 6,831,926). Claims 9, 17, and 19 were rejected under 35 USC §103 as being obvious over Kinstler as applied to claims 5, 10, and 18 above, and further in view of Hendrickson et al. (U.S. Patent 6,241,099).

As outlined above, claims 1-21 are being canceled, thereby rendering the above rejections moot. However, to the extent applicable, the present invention as now recited in claim 22 is directed to a control system for integrating legacy devices with modern control devices, comprising: at least one legacy device that generates discrete output signals; at least one legacy controller operatively connected to receive the discrete output signals therefrom and to output control signals to the at least one legacy device; an integrated signal conditioning circuit operatively connected between the at least one legacy device and the at least one legacy controller so as to condition at least one of the output signals and control signals being communicated therebetween; and a master controller operatively connected to control operation of the integrated signal conditioning circuit so as to control the conditioning

of at least one of the output signals and control signals being communicated therethrough, and to control operation of the at least one legacy controller.

As recited in claim 26, the present invention is directed to a method for controlling a system that integrates legacy devices with modern control devices, comprising the steps of: generating discrete output signals from at least one legacy device; generating control signals from at least one legacy controller in response to the output signals from the at least one legacy device; conditioning at least one of the output signals and control signals being communicated between the at least one legacy device and at least one legacy controller; and controlling via a master controller an operation of the at least one legacy controller and the conditioning of at least one of the output signals and control signals.

Further, as recited in claim 30, the present invention is directed to a mail sorting system that integrates legacy devices with modern control devices, comprising: at least one legacy device that generates discrete sensor output signals; at least one legacy controller operatively connected to receive the discrete sensor output signals therefrom and to output control signals in response thereto; an integrated signal conditioning circuit operatively connected between the at least one legacy device and the at least one legacy controller so as to condition at least one of the output signals and control signals being communicated therebetween; and a master controller operatively connected to control operation of the integrated signal conditioning circuit so as to control the conditioning of at least one of the output signals and control signals being communicated therethrough, and to control operation of the at least one legacy controller.

Applicant will contend that none of the cited references can anticipate or render obvious each and every feature of the present invention as now recited in at least the independent claims described above. As such, the present invention is distinguishable and thus allowable over the prior art of record.

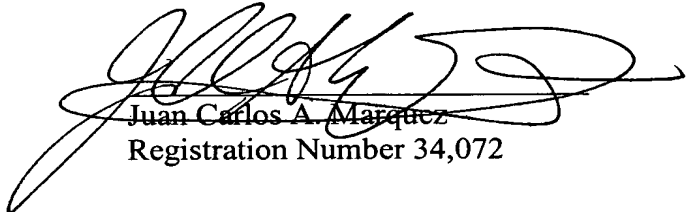
### Conclusion

In view of all the above, Applicant respectfully submits that certain clear and distinct differences as discussed exist between the present invention as now claimed and the prior art references upon which the rejections in the Office Action rely. These differences are more than sufficient to establish that the present invention as now claimed would not have been anticipated nor rendered obvious given the prior art. Rather, the present invention as a whole is distinguishable, and thereby allowable over the prior art.

Favorable reconsideration of this application as amended is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicant's undersigned representative at the address and phone number indicated below.

Respectfully submitted,

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